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DOCKET FILE **ORIGINAL**

RICHARD M. TETTELBAUM Associate General Counsel



June 12, 2000

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JUN 12 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Magalie Roman Salas, Secretary
Federal Communications Commission
Room TW A-325
445 Twelfth Street, S.W.
Washington, DC 20554

Re: Petition of Certain Subsidiaries of Citizens Utilities Company
For Waiver of Sections 64.100, *et seq.*, of the Commission's
Rules, CC Docket No. 94-129

Dear Ms. Salas:

On April 14, 2000, Citizens Utilities Company, on behalf of certain subsidiaries, filed a petition for waiver of Sections 64.1100, *et seq.* of the Commission's Rules in a transaction related to the acquisition of multiple local exchange service areas from certain GTE Incumbent Local Exchange Carriers ("ILEC") subsidiaries. In effect, the transaction, when approved by the requisite regulatory authorities, will result in the substitution of Citizens' ILEC subsidiaries for GTE ILEC subsidiaries in the affected exchange areas.

The Commission's records will reflect that, by letter dated May 26, 2000, we provided additional information in response to an earlier request from Jon Bernstein of the Commission's Accounting Policy Division. We also pointed out the difference between this transaction and other "anti-slamming" waiver proceedings addressed by the Commission – the only long distance traffic at issue in this proceeding is intraLATA toll. Shortly after the May 26 letter, Mr. Bernstein suggested one additional change in our proposed, post-closing materials to be sent to affected customers.

The page of our welcoming brochure that contains the additional change requested by Mr. Bernstein is enclosed with this letter. The change, found in the second sentence under the heading "Local Toll Service," makes it clear to those customers who were GTE intraLATA toll customers that they will not be assessed a PIC change charge when Citizens commences intraLATA toll service.

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Secretary, FCC
June 12, 2000
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Please direct any questions or requests for additional information to the undersigned.

Yours very truly,

A handwritten signature in black ink, appearing to read 'RM Tettelbaum', with a long horizontal flourish extending to the right.

Richard M. Tettelbaum

cc (by telecopy):

Jon Bernstein
Gail Polivy, Esquire
Aloa Stevens

Citizens Long Distance

Stay in touch across town and across the world!

Local Toll Service

If the party you need GTE to make local toll calls, a starter service will be provided for you by Citizens Communications. You have the right to switch your local toll service to the carrier of your choice. With no charge assessed to you, for the change from GTE to Citizens. If you choose to service with Citizens for your local toll service, you will receive first service at rates, terms and conditions at least as good as those GTE provided. If you decide to change your local toll service from GTE to another provider, Citizens will waive applicable switching fees for 30 days following the date Citizens begins to provide service.

Long Distance Service

If you receive long distance service from AT&T, MCI, Sprint, or another provider, GTE Long Distance in Citizens Long Distance, there will be no charge for your long distance calling.

Switching Arrangements

If you use a long distance service that is not local where you may notice an unusual carrier name in the long distance portion of your Citizens Communications bill, the carrier simply is the company providing long distance service to manage to calling. Citizens Communications would like to ensure you that there would be no interruption of long distance service.

Calling Card

If you already have a GTE Long Distance calling card, be free to continue to use it. Citizens will send you a Citizens Communications Calling Card that will enable you to make long distance calls both personally and professionally.

Telephone Directories

Your Citizens directory is complete. Business listings in this new edition, you will receive your brand-new Citizens Communications Phone Book. Your Official Phone Book from Citizens Communications is a complete resource guide for your local community. It contains a wealth of helpful information:

- Neighbors, Businesses and Government Listings
- School Pages: The first place people look to shop and compare
- Emergency Numbers
- Citizens Communications Products and Services

Your community's only Official Phone Book from Citizens Communications. It's worth looking at!

Customer Care Centers

The Citizens Residential Customer Care Center is open Monday through Friday 9 a.m. until 7 p.m. Central Standard Time and on Saturday from 9 a.m. until 5 p.m. Central Standard Time.

CITIZENS RESIDENTIAL CUSTOMER CARE
1-800-921-8102

The Citizens Business Customer Care Center is open Monday through Friday 9 a.m. until 5 p.m. Central Standard Time.

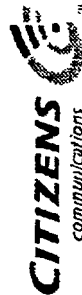
CITIZENS BUSINESS CUSTOMER CARE
1-800-921-8102

Repair Center

The Citizens Repair Center is available to you 24 hours a day, 7 days a week.

CITIZENS REPAIR CENTER
1-800-921-8104

Citizens Communications - Your Hometown Link to the World!



www.citizenscommunications.com



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Call Our Customer Care Centers
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